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March 4, 2022

**VIA ECF** 

Hon. Gregory H. Woods Daniel Patrick Moynihan United States District Courthouse 500 Pearl St. New York, NY 10007-1312 USDC SDNY
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<u>APPLICATION GRANTED:</u> The parties are reminded to direct scheduling matters to the undersigned, as scheduling falls within the general pretrial referral.

**APPLICATION GRANTED** 

Hon. Katharine H. Parker, U.S.M.J. 03/06/2022

Re: Stephen Plumitallo v. Unum Group Corporation, No. 22-CV-1391

Dear Judge Woods:

We represent Defendant Unum Group Corporation in the above-captioned matter. We write to request a 30-day extension of time to answer, move against, or otherwise respond to the Complaint. Such an extension would move the deadline from March 22, 2022 to April 21, 2022 and would not affect any other scheduled dates.

This is Defendant's first request for an extension of time and would enable defense counsel to investigate the allegations in the Complaint. Plaintiff's counsel has represented that Plaintiff consents to the extension. Defendant further agrees that service of process of the Complaint is complete and sufficient.

Respectfully,

Patrick W. Shea

of PAUL HASTINGS LLP

**PWS**